

Inge Declaration Exhibit 2

Archived: Sunday, August 14, 2022 10:09:25 AM

From: [Amos, David L.](#)

Sent: Friday, January 14, 2022 3:29:12 PM

To: [Wei Ji](#)

Cc: [Lewis, Kenneth M.](#), [Inge, Vernon E.](#), [Slate, Elizabeth J.](#)

Subject: RE: 1:20-cv-10689-llc Dale Merrill v. Jing Deng --

Importance: Normal

Sensitivity: None

Attachments:

WTP-#12171238-v1-Notice_of_Deposition_(Deng).pdf WTP-#12171226-v1-30(b)(6)_Deposition_Notice.pdf

Ms. Ji,

Attached please find those deposition notices discussed. I tried you earlier and left a voicemail, please call me back at your earliest convenience.

Sincerely,

David



Whiteford Taylor Preston

David L. Amos | Attorney at Law

3190 Fairview Park Drive | Suite 800 | Falls Church, VA 22042

t: 703.280.9276 | f: 703.280.9137 | m: 540.539.3099

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PANGEA NET

From: Amos, David L.

Sent: Friday, January 14, 2022 1:55 PM

To: Wei Ji <wji@alliancelaw.net>

Cc: Lewis, Kenneth M. <KLewis@wtplaw.com>; Inge, Vernon E. <VINge@wtplaw.com>; Slate, Elizabeth J. <ESlate@wtplaw.com>

Subject: RE: 1:20-cv-10689-llc Dale Merrill v. Jing Deng --

Ms. Ji,

There are some minor revisions to the proposed scheduling order attached to clean it up.

Sincerely,

David



Whiteford Taylor Preston

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PANGAEA NET

From: Amos, David L.

Sent: Friday, January 14, 2022 11:59 AM

To: Wei Ji <wji@alliancelaw.net>

Cc: Lewis, Kenneth M. <KLewis@wtplaw.com>; Inge, Vernon E. <VINge@wtplaw.com>; Slate, Elizabeth J. <ESlate@wtplaw.com>

Subject: RE: 1:20-cv-10689-Ilc Dale Merrill v. Jing Deng --

Ms. Ji,

Consistent with our conversation, please find a draft consent letter motion and draft proposed amended scheduling order attached. I will be following up shortly with the claims data we discussed as well as those deposition notices. I'll be giving you a call as well.

Sincerely,

David



Whiteford Taylor Preston

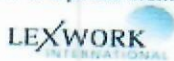
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PANGAEA NET

From: Amos, David L.

Sent: Thursday, January 13, 2022 5:15 PM

To: Wei Ji <wji@alliancelaw.net>

Cc: Lewis, Kenneth M. <KLewis@wtplaw.com>; Inge, Vernon E. <VINge@wtplaw.com>; Slate, Elizabeth J. <ESlate@wtplaw.com>

Subject: 1:20-cv-10689-Ilc Dale Merrill v. Jing Deng --

Ms. Ji,

It was a pleasure speaking with you earlier today and I hope you're feeling better. As discussed, attached please find discovery requests and I'll be following up shortly with deposition notices as well. Please let me know your availability later next week for that call and ahead of that, I'll provide you that information we discussed to facilitate a settlement discussion. I look forward to speaking with you again soon.

Sincerely,

David



David L. Amos | Attorney at Law

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Vernon E. Inge, Jr.
David L. Amos (*pro hac vice* admission pending)

*Attorneys for Dale Merrill, Administrator of
the Mashantucket Pequot Tribal National Health Plan*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DALE MERILL, ADMINISTRATOR OF
THE MASHANTUCKET PEQUOT TRIBAL
NATIONAL HEALTH PLAN,

Plaintiff,

— against —

JIN DENG M.D. and JIN DENG MD
REHABILITATION, P.C.,

Defendants.

Civil Action No.: 1:20-cv-10689

PLAINTIFF'S NOTICE OF DEPOSITION

TO: Jin Deng MD Rehabilitation, P.C.
c/o Wei Ji, Esq.
ALLIANCE LAW PLLC
139 Centre Street Suite 710
New York, New York 10013
wji@alliancelaw.net

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure,
Plaintiffs shall take the deposition of the person or persons employed by and/or representing the

Defendant Jin Deng MD Rehabilitation, P.C. who has the most complete knowledge of the topics and requested Information set forth in Schedule A attached hereto.

The deposition shall commence at **10:00 a.m. on February 2, 2020** and will occur remotely as is reasonably agreed upon among counsel for the parties. The deposition will be taken before a notary public, or other person authorized by law to administer an oath, will be recorded by video and/or stenographic means, and will continue from day to day until complete. The deposition may be used for any purpose permitted under the Federal Rules of Civil Procedure.

Dated: January 14, 2022

WHITEFORD, TAYLOR & PRESTON L.L.P.

By: /s/ Vernon E. Inge, Jr.
Vernon E. Inge, Jr.
David L. Amos (*pro hac vice* admission
pending)
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klewis@wtplaw.com

*Attorneys for the Plaintiff, Dale Merrill,
Administrator of the Mashantucket Pequot
Tribal National Health Plan*

CERTIFICATE OF SERVICE

I hereby certify that on the 14th of January, 2022, a true and accurate copy of the foregoing was served by electronic mail upon the following:

Wei Ji, Esq.
ALLIANCE LAW PLLC
139 Centre Street Suite 710
New York, New York 10013
wji@alliancelaw.net

Attorney for Defendants.

/s/ Vernon E. Inge, Jr.
Counsel

SCHEDULE "A"
TOPICS FOR EXAMINATION

1. Information pertaining to the contractual relationship between Jin Deng MD Rehabilitation, P.C. ("**Defendant**") and The Mashantucket Pequot Tribal National Health Plan (the "**Plan**").
2. Information pertaining to Defendant's claims and bills submitted to the Plan.
3. Information pertaining to Defendant's claims and/or damages asserted in its Amended Counterclaim filed in this matter.
4. Information relating to Defendant's billing practices.
5. Information relating to the affirmative defenses asserted in response to the Complaint in this matter.

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Vernon E. Inge, Jr.
David L. Amos (*pro hac vice* admission pending)

*Attorneys for Dale Merrill, Administrator of
the Mashantucket Pequot Tribal National Health Plan*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DALE MERILL, ADMINISTRATOR OF
THE MASHANTUCKET PEQUOT TRIBAL
NATIONAL HEALTH PLAN,

Plaintiff,

— against —

JIN DENG M.D. and JIN DENG MD
REHABILITATION, P.C.,

Defendants.

Civil Action No.: 1:20-cv-10689

PLAINTIFF'S NOTICE OF DEPOSITION

TO: Jin Deng, M.D.
c/o Wei Ji, Esq.
ALLIANCE LAW PLLC
139 Centre Street Suite 710
New York, New York 10013
wji@alliancelaw.net

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure,
Plaintiffs shall take the deposition of Defendant Jin Deng, M.D.

The deposition shall commence at 10:00 a.m. on February 3, 2022 and will occur remotely as is reasonably agreed upon among counsel for the parties. The deposition will be taken before a notary public, or other person authorized by law to administer an oath, will be recorded by video and/or stenographic means, and will continue from day to day until complete. The deposition may be used for any purpose permitted under the Federal Rules of Civil Procedure.

Dated: January 14, 2022

WHITEFORD, TAYLOR & PRESTON L.L.P.

By: /s/ Vernon E. Inge, Jr.
Vernon E. Inge, Jr.
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*Attorneys for the Plaintiff, Dale Merrill,
Administrator of the Mashantucket Pequot
Tribal National Health Plan*

CERTIFICATE OF SERVICE

I hereby certify that on the 14th of January, 2022, a true and accurate copy of the foregoing was served by electronic mail upon the following:

Wei Ji, Esq.
ALLIANCE LAW PLLC
139 Centre Street Suite 710
New York, New York 10013
wji@alliancelaw.net

Attorney for Defendants.

/s/ Vernon E. Inge, Jr.
Counsel

